

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TOMMY BROWN, on his own behalf and on
behalf of other similarly situated persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00680-DGE

STIPULATED MOTION AND
[PROPOSED] ORDER TO
CONTINUE DEADLINE TO FILE
PROPOSED SCHEDULE FOR
EVENTS RELATED TO CLASS
CERTIFICATION AND
DISPOSITIVE MOTIONS AND ESI
PROTOCOL

NOTE ON MOTION CALENDAR:

Monday, March 13, 2023

Pursuant to Western District of Washington Local Civil Rules 7(d)(1) and 10(g), and in a cooperative effort to comply with this Court's February 24, 2023 directive to file a proposed schedule for class certification and dispositive motion on loan ownership, and the ESI protocol, and after meeting and conferring, Plaintiff Tommy Brown ("Plaintiff") and Defendants Transworld Systems Inc. ("TSI"), Patenaude & Felix, APC ("P&F"), U.S. Bank National Association ("U.S. Bank"), National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate

STIPULATED MOTION AND [PROPOSED] ORDER TO
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AND ESI PROTOCOL (NO. 2:20-CV-00680-DGE) – 1

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Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2 (collectively, “the Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”), respectfully submit this stipulated motion to continue the deadline to file: (1) the proposed schedule for events relating to Plaintiff’s motion for class certification and initial, appropriate dispositive motions (including the Defendants’ desired motion on loan ownership), (2) a proposed ESI protocol, and (3) a proposed case management order. The parties propose the following continued deadline and conference date:

| Event | Deadline |
|--|--------------------------|
| Submission of Proposed Schedule For Events Relating to Class Certification and Dispositive Motions, Proposed Case Management Order, and ESI Protocol | Thursday, March 30, 2023 |

The parties have entered this stipulation to accommodate the limited availability of parties and counsel, and to mutually cooperate in the management of this action and for the purpose of maximizing judicial economy and conserving the parties’ resources. The extension of the above deadlines does not alter or modify any other rights or responsibilities of the parties except as stated herein permitted by law or under the Federal Rules of Civil Procedure, the Local Civil Rules, or other prior orders of this Court.

DATED: March 13, 2023.

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[PROPOSED] ORDER

IT IS SO ORDERED:

Based on the parties' representations, the schedule for filing the Proposed Schedule for Class Certification and Dispositive Motions, Proposed Case Management Order, and ESI Protocol is as follows:

| Event | Deadline |
|--|--------------------------|
| Submission of Proposed Schedule For Events Relating to Class Certification and Initial Dispositive Motions, Proposed Case Management Order, and ESI Protocol | Thursday, March 30, 2023 |

DATED this ____ the day of March, 2022.

Honorable David G. Estudillo
United States District Judge

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